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March 16, 2017

Via: ECF
The Honorable Brian M. Cogan U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: FLORES v JOEL MARTINEZ d/b/a LA BELLA PIZZERIA
Civil Action No. 17-CV-0561

Dear Judge Cogan:

We are counsel to Plaintiff. We respectfully write Your Honor to request an adjournment of the Initial Conference currently scheduled for tomorrow March 17, 2017. On February 2, 2017 we served the Complaint to Defendants, and on February 24, 2017 we mailed Defendants a copy of Your Honor's Order dated February 2, 2017 regarding the date for the Initial Conference. Additionally, we have made numerous attempts by telephone to Defendants' establishment, and as of yet have received no response. We apologize for any inconvenience this may have caused Your Honor and our intentions were to explain this at tomorrow's conference. Accordingly, we respectfully request that the Initial Conference be adjourned to the following proposed dates: April 17, 18, 19, or 20 or any date thereafter that is convenient to the Court. If Defendants do not respond within the proscribed time period then we will immediately move for a default judgment.

We thank Your Honor for considering this matter.

Respectfully submitted,

Robert L. Kraselnik

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